

UC Davis Comments on the Tentative NPDES Permit for the Campus Main WWTP

Comment No.	Page(s)	Section	Comments
1	11	IV. Effluent Limitations and Discharge Specifications	f. i- the 7-day median contains two number (2.2/23 MPN/100ml). Missing the words of Daily Max.
2	12	V. Receiving Water Limitations	under bacteria - has limit "based on a minimum of not less than 5 samples for any 30 day period" yet we are required to test quarterly - please remove this section of the limitation.
3	14	B. Groundwater Limitations	2. a - the 2.2 MPN/100 ml is a new one requirement. Since many coliforms exist in the earth naturally. It is likely the groundwater contains small amount of coliform without being contaminated from wastewater. Suggest changing the sentence from "Total coliform organism median of 2.2 MPN/100 ml over any seven-day period" to "Fecal coliform organisms median of 2.2 MPN/100 ml over any seven-day period."
4	20	f. Salinity EC Site-Specific Study	The University will gladly comply with this requirement, but it's worth noting that we have not received any formal comments on the previous studies submitted several years ago. The University will need some additional direction regarding this requirement.
5	23	c. Salinity/EC Site -specific Study	See Comment #8
6	30	VII. Compliance Determination	part G - talks about continuous monitoring analyzers for chlorine residual which we do not have - should this be taken out of permit?
7	E-2	Table E-1 - Monitoring Station Locations	Descriptions for RSW-002U and RSW-002D are reversed.
8	E-4	IV. Effluent Monitoring Requirements	Table E-3 note #2 - Change the effluent temperature monitoring location to EFF-001. Since both Outfalls are more than half mile away from the plant. All the rest of the effluent monitoring is at the EFF-001 under this tentative permit.
9	E-8&9	VIII. Receiving Water Monitoring Requirements - Surface Water and Groundwater	request we sample only from the stream we are discharging to. (i.e. - the arboretum 002 sites during the summer, and the putah Creek 001 sites in the winter), and that we test those sites weekly - not 001 weekly and 002 monthly as currently
10	E-12	IX. Other Monitoring Requirements	C. In Table E-9, note #1 change the "if the influent to UV system" to "if the turbidity collected at EFF-001" so it will be consistent with note #3.
11	E-12	Table E-8	Suggest we add footnote to the continuous minimum frequency monitoring of the UV transmittance that says " If UVT analyzer is out of service, a minimal 2 UVT samples shall be grabbed and analyzed per day. Grab sample results will then be entered into the UV control system as the value used for UV dose calculation."
12	F-19	Receiving Water Limitations	g - Chlorine residual - narrative says "the discharger can immediately comply with these new effluent limitations with chlorine residual". It is true we will meet permit limits since we do not use chlorine, however, we do NOT have a continuous monitoring system in place and therefore will not be able to meet the testing requirement for chlorine residual listed on page 30 of permit.
13	F-29	v. Salinity Effluent Limitations	under the fourth paragraphs, which requires the Discharger to conduct a salinity/EC Site -specific Study. The University will need some additional direction regarding this requirement. See comment #4.
14	F32	v. Settleable Solids	v - Remove last sentence. It refers to copper, not settleable solids.
15	F-56	c. Salinity/EC Site -specific Study	See Comment #8